

Joseph G. Went, Esq.  
Nevada Bar No. 9220  
Sydney R. Gambee, Esq.  
Nevada Bar No. 14201  
HOLLAND & HART LLP  
9555 Hillwood Drive, 2nd Floor  
Las Vegas, NV 89134  
Phone: (702) 669-4600  
Fax: (702) 669-4650  
[JGWent@hollandhart.com](mailto:JGWent@hollandhart.com)  
[SRGambee@hollandhart.com](mailto:SRGambee@hollandhart.com)

Brendan H. Connors, Esq. (*pro hac vice* application forthcoming)  
REED SMITH LLP  
901 East Byrd Street, Suite 1700  
Richmond, VA 23219  
Phone: (804) 344-3400  
[bconnors@reedsmith.com](mailto:bconnors@reedsmith.com)

*Counsel for Defendant Synchrony Bank*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

PAMELA J. ROCHE,

Plaintiff,

vs.

SYNCHRONY BANK, et al.,

Defendants.

Case No. 2:18-cv-00434-GMN-GWF

**STIPULATION [AND ORDER] TO  
EXTEND TIME TO FILE RESPONSE TO  
COMPLAINT**

**(Second Request)**

Plaintiff Pamela J. Roche (“Plaintiff”) and Defendant Synchrony Bank (“Synchrony”), by and through their counsel, hereby stipulate and agree pursuant to LR IA 6-1, LR IA 6-2, and LR 7-1 as follows:

**STIPULATION**

1. On March 9, 2018, Plaintiff filed a Complaint with this Court [ECF No. 1].
2. Synchrony was served with the Complaint on March 20, 2018.
3. Synchrony was due to file a response to the Complaint by April 10, 2018.

1           4.       On April 10, 2018, counsel for Synchrony and Plaintiff jointly stipulated to extending  
2 Synchrony's deadline to file a response to the Complaint to May 1, 2018.

3           5.       The Parties continue to engage in preliminary discussions in this matter. In order to  
4 explore the possibility of early resolution, counsel for Synchrony desires an extension until May 15,  
5 2018, to file a response to the Complaint.

6           6.       Counsel for Synchrony conferred with counsel for the Plaintiff regarding this  
7 Stipulation. Counsel for the Plaintiff does not oppose this requested extension.

8           7.       The requested extension will allow the Parties time to potentially negotiate a  
9 resolution of this matter.

10          8.       The foregoing Stipulation is filed in good faith and not for dilatory or other improper  
11 purpose. The Plaintiff would not suffer any prejudice by the Court permitting Synchrony the  
12 requested extension of time and has consented to the requested extension.

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1           9.       Granting this Stipulation is in the interests of justice and is otherwise the right and  
2 proper thing to do.

3           DATED: April 30, 2018.

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5 /s/ Sydney R. Gambee  
6 Joseph G. Went, Esq.  
Nevada Bar No. 9220  
7 Sydney R. Gambee, Esq.  
Nevada Bar No. 14201  
8 HOLLAND & HART LLP  
9555 Hillwood Drive, 2nd Floor  
9 Las Vegas, NV 89134

/s/ David H. Krieger  
David H. Krieger, Esq.  
Nevada Bar No. 9086  
HAINES & KRIEGER, LLC  
8985 S. Eastern Avenue, Suite 350  
Henderson, NV 89123

*Counsel for Plaintiff Pamela J. Roche*

10 Brendan H. Connors, Esq. (*pro hac vice*  
application forthcoming)  
11 REED SMITH LLP  
901 East Byrd Street, Suite 1700  
12 Richmond, VA 23219

13 *Counsel for Defendant Synchrony Bank*

14  
15 **ORDER**

16  
17 **IT IS SO ORDERED.**



18 UNITED STATES MAGISTRATE JUDGE

19 DATED: 5-1-2018  
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